

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re: )  
AMBROSE CONSTRUCTION AND ) Case No. 15-13956  
ROUSTABOUT SERVICE, LLC ) Chapter 11  
Debtor. )  
)

**MOTION FOR ADMISSION PRO HAC VICE**

Counsel for Secured Creditor VFP Asset Funding, LLC, ("VFP"), William H. Hoch, of the firm Crowe & Dunlevy, P.C. ("Movant"), hereby moves, pursuant to Local Bankruptcy Rule 9010(G) and LCvR 83.2, for the admission *pro hac vice* of John Joseph Dyer in this case. In support of this Motion, Movant states:

1. John Dyer, of the firm Greenberg Traurig, LLP, is currently a member in good standing of the bar of the state of Georgia and is admitted to practice in the United States District Courts for the Northern and Middle Districts of Georgia. Mr. Dyer is familiar with and is prepared to comply in all respects with the most recent Local Rules of this Court, is not subject to any disciplinary action, nor has he ever been disciplined for unethical or improper conduct by any court before which he has been admitted to practice and agrees to and shall observe all applicable local rules and the dates fixed for motions or any other proceedings scheduled in this case. A copy of Mr. Dyer's Request for Admission *Pro Hac Vice* is attached hereto as Exhibit "1".

2. Movant has been retained as resident counsel, is a member in good standing of this Court, and maintains a law office in this judicial district. Movant's Application for Employment in this bankruptcy case is pending.

WHEREFORE, Movant respectfully requests that this Court enter an Order granting this Motion, admitting John Dyer *pro hac vice* in this matter.

Respectfully Submitted,

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/s/ William H. Hoch  
William H. Hoch III, OBA #15788  
John Napier, Texas Bar No. 24070314

Of the Firm

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ATTORNEYS FOR VFP ASSET  
FUNDING, LLC

**CERTIFICATE OF SERVICE**

This is to certify that on the 16th day of October, 2015, a true and correct copy of the above and foregoing document was served via the Court's ECF system to the following registered recipients:

Jeffrey E. Tate, Counsel for Debtor  
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/s/ William H. Hoch  
William H. Hoch III, OBA #15788